

**UNITED STATES DISTRICT COURT
FOR THE
NORTHERN DISTRICT OF OHIO
Eastern Division**

HODELL-NATCO INDUSTRIES, INC.)	CASE NO. 1:08 CV 2755
)	
Plaintiff,)	JUDGE: LESLEY WELLS
)	
v.)	MAGISTRATE JUDGE: GREG WHITE
)	
SAP AMERICA, INC., et al.)	Stipulated Motion for Plaintiff Hodell-Natco
)	Industries, Inc. to Receive Thirty-Day Extension
Defendants.)	To Respond to Motion to Dismiss Filed by
)	Defendants SAP America, Inc. and SAP A.G.

Plaintiff Hodell-Natco Industries, Inc. (“Hodell-Natco”), by and through undersigned counsel, and pursuant to Fed. R. Civ. P. 6(b), submits the following Motion moving this Honorable Court for an Order granting Hodell-Natco an extension of thirty (30) days in which to oppose the Motion to Dismiss filed by defendants SAP America, Inc. and SAP A.G. on March 12, 2009. Hodell-Natco requests an extension until April 23, 2009 in which to oppose that Motion.

Counsel for Hodell-Natco has conferred with counsel for the SAP defendants, who has indicated that he consents to the requested thirty-day extension. Counsel for Hodell-Natco submits that the requested extension is justified so that counsel may adequately address the arguments contained within defendants’ Motion. This motion is not being interposed for purposes of delay and will not prejudice any party.

Accordingly, based upon the foregoing, Hodell-Natco requests an extension until April 23, 2009 in which to oppose defendants’ Motion to Dismiss.

Respectfully submitted,

/s/ P. Wesley Lambert

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Attorneys for Defendant Hodell-Natco

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CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of March, 2009, a copy of preceding document was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s/ P. Wesley Lambert

P. Wesley Lambert (Ohio Bar No. 0076961)